ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 94-120
AT&T Communications	)	
Tariff F.C.C. Nos. 9 and 11	)	Transmittal No. 6788

COMMENTS OF BELL ATLANTIC[1]

Rather than justifying provisions of its tariff, two aspects of AT&T Corp.'s ("AT&T's") Direct Case appear to confirm that AT&T's tariff includes unreasonable conditions for Feature Group A and B connection services.[2] The Commission should require AT&T to modify its tariff to eliminate those inequities.

In responding to Issue No. 2, Question 2, AT&T addresses whether an end user may use facilities obtained from the local exchange carrier ("LEC") to connect to AT&T's point of presence ("POP") rather than subscribing to AT&T's connection service. AT&T states that an end user may do so, "subject to AT&T's standard interface requirements."[3] As part of those interface requirements, however, "AT&T requires that traffic be

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[1] The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

[2] Direct Case of AT&T Corp. ("Direct Case") Att. 1 at 7.

[3] *Id.*

delivered of [sic] a DS-1 level (at a minimum)."[4] Many end
users need only a small number of voice grade circuits, however.
AT&T's condition could force those users to subscribe to full DS-
1 circuits from the LEC to terminate in an AT&T POP.

AT&T justifies its restriction by arguing that "it is
the LEC's obligation to aggregate traffic or otherwise to provide
its access services in a manner that the traffic can be delivered
to the interexchange carrier."[5] There is no justification,
however, for AT&T, the dominant interexchange carrier, to
arbitrarily impose a condition that will inflict unreasonable
costs on end users and/or LECs in meeting service needs. AT&T
does not even attempt to justify its minimum DS-1 requirement in
its direct case. Accordingly, AT&T has not met its burden of
showing why this limitation is reasonable.

The second issue involves billing for direct trunked
transport ("DT") facilities. AT&T, in responding to Issue No. 4,
asserts that, "[a]fter the transport restructure, all LEC
[entrance facilities] or DT facilities carrying Feature Group A
or B traffic are being charged to AT&T."[6] Bell Atlantic,
however, has traditionally billed end users directly for the DT
service when Bell Atlantic multiplexes DS-1 facilities at the

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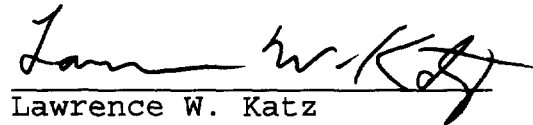[4] Direct Case at 7.

[5] *Id*.

[6] *Id*., Att. 1 at 12.

serving wire center and intends to continue to do so.[7] If AT&T plans to bill users in all instances, some customers could be double-billed for their services -- once by Bell Atlantic and again by AT&T. The Commission should require AT&T to clarify how its tariff prevents such double billing.

Respectfully submitted,

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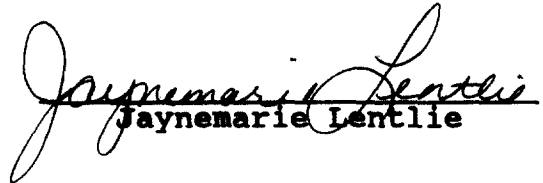
November 10, 1994

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[7] The interexchange carrier is billed when the multiplexing is done at the end office.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Bell Atlantic" was served this 10th day of November, 1994, by first class mail, postage prepaid, on the parties on the attached list.

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